

EXHIBIT J

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**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Philip Wong, Frederic Chaussy, and Leslie
Marie Shearn, individually, on behalf of all
others similarly situated, and on behalf of
the general public,

Plaintiffs,

vs.

HSBC Mortgage Corporation (USA);
HSBC Bank USA, N.A.; and DOES 1
through 50, inclusive,

Defendants.

Case No.: 3:07-cv-2446 MMC

**PLAINTIFF FREDERIC CHAUSSY'S
RESPONSES TO DEFENDANT HSBC
MORTGAGE CORPORATION (USA)'S
REQUEST FOR PRODUCTION OF
DOCUMENTS, SET I**

1 PROPOUNDING PARTY: Defendant HSBC MORTGAGE CORPORATION (USA)

2 RESPONDING PARTY: Plaintiff FREDERIC CHAUSSY

3 SET NUMBER: One (1)

4 TO: PLAINTIFF AND HIS ATTORNEYS OF RECORD

5 **REQUEST FOR PRODUCTION NO. 1:**

6 All documents which relate to, refer to, show, or reflect communications, oral or
7 written, including, without limitation, policies, procedures, handbooks, memoranda, grievances,
8 applications, postings, complaints, wage information, benefits information and work schedules,
9 between Plaintiff and HMCU, regarding the subject matter of the First Amended Complaint.

10 **OBJECTION:**

11 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
12 burdensome, seeks information that it not relevant to a claim or defense or reasonably calculated
13 to lead to the discovery of admissible evidence. Further, the information sought is in Defendant's
14 possession, and therefore can be obtained from some other source that is more convenient, less
15 burdensome, or less expensive.

16 **RESPONSE TO REQUEST NO. 1:**

17 Without waiving these objections, Plaintiff states that in response to this overly
18 broad request, he will produce all documents in his possession relating to his employment with
19 Defendant.

20 **REQUEST FOR PRODUCTION NO. 2:**

21 All documents and things acquired or received by Plaintiff by virtue of Plaintiff's
22 employment with HMCU including, without limitation, all books, records, files, or data
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1 downloaded by Plaintiff from any desktop, personal, portable, or mainframe computer and any
2 abstracts, copies or summaries thereof.

3 **OBJECTION:**

4 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
5 burdensome, cumulative, and seeks information that it not relevant to a claim or defense or
6 reasonably calculated to lead to the discovery of admissible evidence.
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8 **RESPONSE TO REQUEST NO. 2:**

9 Without waiving these objections, Plaintiff states that in response to this overly
10 broad request, he will produce all documents in his possession relating to his employment with
11 Defendant.
12

13 **REQUEST FOR PRODUCTION NO. 3:**

14 All documents and things created by Plaintiff in connection with Plaintiff's
15 employment with HMCU, including but without limitation any memoranda, charts, reports,
16 summaries, spreadsheets, electronic mail messages, or other documents created by Plaintiff to be
17 used to present information to prospective clients or customers or existing clients or customers.
18

19 **OBJECTION:**

20 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
21 burdensome, seeks information that it not relevant to a claim or defense or reasonably calculated
22 to lead to the discovery of admissible evidence. Further, because the information sought is be in
23 Defendant's possession – particularly the server containing Plaintiff's entire email file - they can
24 be obtained from a source that is more convenient, less burdensome, or less expensive.
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27 **RESPONSE TO REQUEST NO. 3:**

1 Without waiving these objections, Plaintiff states that in response to this overly
2 broad request, he will produce all documents in his possession relating to his employment with
3 Defendant.

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6 **REQUEST FOR PRODUCTION NO. 4:**

7 All documents and things Plaintiff has removed from HMCU's premises.

8 **OBJECTION:**

9 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
10 burdensome, cumulative, seeks information that it not relevant to a claim or defense or reasonably
11 calculated to lead to the discovery of admissible evidence. Further, because all documents
12 relating to Plaintiff's employment are in Defendant's possession they can be obtained from a
13 source that is more convenient, less burdensome, or less expensive.

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15 **RESPONSE TO REQUEST NO. 4:**

16 Without waiving these objections, Plaintiff states that in response to this overly
17 broad and cumulative request, he will produce all documents in his possession relating to his
18 employment with Defendant.

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21 **REQUEST FOR PRODUCTION NO. 5:**

22 Any and all documents that relate to, refer to, show, or reflect the hours Plaintiff
23 has worked each and every day during his employment with HMCU.

24 **OBJECTION:**

25 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
26 burdensome, and cumulative. Further, because the information sought is be in Defendant's
27 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
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1 branch schedules, payroll, benefits, and leave records, and other documents identifying time and
2 date of work performed – it can be obtained from a source that is more convenient, less
3 burdensome, or less expensive.

4 **RESPONSE TO REQUEST NO. 5:**

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6 Without waiving these objections, Plaintiff states that in response to this overly
7 broad and cumulative request, he will produce all documents in his possession relating to his
8 employment with Defendant.

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10 **REQUEST FOR PRODUCTION NO. 6:**

11 All documents that relate to, refer to, show or reflect the days Plaintiff has worked
12 during his employment with HMCU, including, but without limitation, any and all documents that
13 describe the exact hours of work for each such day, any time for breakfasts, lunches, dinners,
14 smoking, attending to personal issues or tasks that are not or were not work related, meal periods,
15 break periods or rest periods.

16
17 **OBJECTION:**

18 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
19 burdensome, and cumulative. Further, because the information sought is be in Defendant's
20 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
21 branch schedules, payroll, benefits, and leave records, and other documents identifying time and
22 date of work performed - it can be obtained from a source that is more convenient, less
23 burdensome, or less expensive.

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25 **RESPONSE TO REQUEST NO. 6:**

1 Without waiving these objections, Plaintiff states that in response to this overly
2 broad and cumulative request, he will produce all documents in his possession relating to his
3 employment with Defendant.

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6 **REQUEST FOR PRODUCTION NO. 7:**

7 All documents that relate to, refer to, show, or reflect the weeks of the year(s)
8 Plaintiff has worked during his employment with HMCU, including, but without limitation, any
9 and all documents that describe the exact hours of work for each such week, any time taken for
10 breakfasts, lunches, dinners, smoking, attending to personal issues or tasks that are not or were
11 not work related, meal periods, break periods or rest periods.

12 **OBJECTION:**

13
14 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
15 burdensome, and cumulative. Further, because the information sought is be in Defendant's
16 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
17 branch schedules, payroll, benefits, and leave records, and other documents identifying time and
18 date of work performed - it can be obtained from a source that is more convenient, less
19 burdensome, or less expensive.

20 **RESPONSE TO REQUEST NO. 7:**

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22 Without waiving these objections, Plaintiff states that in response to this overly
23 broad and cumulative request, he will produce all documents in his possession relating to his
24 employment with Defendant.

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26 **REQUEST FOR PRODUCTION NO. 8:**

1 All documents that relate to, refer to, show, or reflect the months of the year(s)
2 Plaintiff has worked during his employment with HMCU, including, but without limitation, any
3 and all documents that describe the exact hours of work for each such month, any time taken for
4 breakfasts, lunches, dinners, smoking, attending to personal issues or tasks that are not or were
5 not work related, meal periods, break periods or rest periods.
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7 **OBJECTION:**

8 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
9 burdensome, and cumulative. Further, because the information sought is be in Defendant's
10 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
11 branch schedules, payroll, benefits, and leave records, and other documents identifying time and
12 date of work performed - it can be obtained from a source that is more convenient, less
13 burdensome, or less expensive.
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15 **RESPONSE TO REQUEST NO. 8:**

16 Without waiving these objections, Plaintiff states that in response to this overly
17 broad and cumulative request, he will produce all documents in his possession relating to his
18 employment with Defendant.
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20 **REQUEST FOR PRODUCTION NO. 9:**

21 Any and all documents reflection Plaintiff's work assignments and/or assigned
22 duties during his employment with HMCU.
23

24 **OBJECTION:**

25 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
26 burdensome, and cumulative. Further, because the information sought is be in Defendant's
27 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
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1 branch schedules, and other documents identifying Plaintiff's job assignments - it can be obtained
2 from a source that is more convenient, less burdensome, or less expensive.

3 **RESPONSE TO REQUEST NO. 9:**

4 Without waiving these objections, Plaintiff states that in response to this overly
5 broad request, he will produce all documents in his possession relating to his employment with
6 Defendant.
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9 **REQUEST FOR PRODUCTION NO. 10:**

10 All documents that relate to, refer to, show, or reflect job duties actually performed
11 by Plaintiff while employed at HMCU.
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13 **OBJECTION:**

14 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
15 burdensome, and cumulative. Further, because the information sought is be in Defendant's
16 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
17 branch schedules, and other documents identifying Plaintiff's job duties - it can be obtained from
18 a source that is more convenient, less burdensome, or less expensive.
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20 **RESPONSE TO REQUEST NO. 10:**

21 Without waiving these objections, Plaintiff states that in response to this overly
22 broad request, he will produce all documents in his possession relating to his employment with
23 Defendant.
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25 **REQUEST FOR PRODUCTION NO. 11:**

26 All electronic mail sent by Plaintiff, including, but without limitation, electronic
27 mail sent from any personal electronic mail accounts, between the hours of 6:00 a.m. to 7:30 a.m.
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1 and 9:00 a.m. to 5:00 p.m., Monday through Friday, at any time during Plaintiff's employment
2 with HMCU.

3 **OBJECTION:**

4 Plaintiff objects to this request on the grounds that Defendant is in possession, and
5 has yet to produce, the server containing Plaintiff's entire email files. As such, the information
6 sought can be obtained from a source that is more convenient, less burdensome, or less expensive.
7

8 **RESPONSE TO REQUEST NO. 11:**

9 Without waiving these objections, Plaintiff states that in response to this request,
10 he will produce all emails in his possession relating to his employment with Defendant.
11

12 **REQUEST FOR PRODUCTION NO. 12:**

13 All electronic mail sent by Plaintiff, including, but without limitation, electronic
14 mail sent from any personal electronic mail accounts, between the hours of 10:00 a.m. to 3:00
15 p.m. on Saturdays at any time during Plaintiff's employment with HMCU.
16

17 **OBJECTION:**

18 Plaintiff objects to this request on the grounds that Defendant is in possession, and
19 has yet to produce, the server containing Plaintiff's entire email files. As such, the information
20 sought can be obtained from a source that is more convenient, less burdensome, or less expensive.
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22 **RESPONSE TO REQUEST NO. 12:** Without waiving these objections, Plaintiff states that in
23 response to this request, he will produce all emails in his possession relating to his employment
24 with Defendant.
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26 **REQUEST FOR PRODUCTION NO. 13:**
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1 All documents that relate to, refer to, show, or reflect Plaintiff's communications
2 with HMCU employees, clients or prospective clients after 5:00 p.m., Monday through Friday at
3 any time during Plaintiff's employment with HMCU.

4 **OBJECTION:**

5 Plaintiff objects to this request on the grounds that Defendant is in possession, and
6 has yet to produce, the server containing Plaintiff's and his supervisors' entire email files and
7 Plaintiff's phone records. As such, the information sought can be obtained from a source that is
8 more convenient, less burdensome, or less expensive.

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10 **RESPONSE TO REQUEST NO. 13:**

11 Without waiving these objections, Plaintiff states that in response to this request,
12 he will produce all emails and phone records in his possession reflecting communications with
13 HMCU employees, clients and prospective clients.

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16 **REQUEST FOR PRODUCTION NO. 14:**

17 All documents that relate to, refer to, show, or reflect an evaluation of Plaintiff's
18 job performance while employed by HMCU.

19 **OBJECTION:**

20 Plaintiff objects to this request on the grounds that it is cumulative. Further,
21 because the information sought is be in Defendant's possession, it can be obtained from a source
22 that is more convenient, less burdensome, or less expensive.

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24 **RESPONSE TO REQUEST NO. 14:**

25 Without waiving these objections, Plaintiff states that in response to this request,
26 he will produce all documents in his possession relating to his employment with Defendant,
27 including performance related documents.

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2 **REQUEST FOR PRODUCTION NO. 15:**

3 All documents that relate to, refer to, show, or reflect policies and/or procedures
4 related the position(s) Plaintiff holds or held while employed by HMCU.
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6 **OBJECTION:**

7 Plaintiff objects to this request on the grounds that it is cumulative, seeks
8 information that it not relevant to a claim or defense or reasonably calculated to lead to the
9 discovery of admissible evidence. Further, because all documents relating to Plaintiff's
10 employment – including all policies and procedures that related to his job - are in Defendant's
11 possession they can be obtained from a source that is more convenient, less burdensome, or less
12 expensive.
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14 **RESPONSE TO REQUEST NO. 15:**

15 Without waiving these objections, Plaintiff states that in response to this
16 cumulative request, he will produce all documents in his possession relating to his employment
17 with Defendant.
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21 **REQUEST FOR PRODUCTION NO. 16:**

22 All documents that relate to, refer to, show or reflect training for the position(s)
23 Plaintiff holds or held while employed by HMCU.

24 **OBJECTION:**

25 Plaintiff objects to this request on the grounds that it is cumulative. Further,
26 because all documents relating to Plaintiff's employment – including all training materials - are in
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1 Defendant's possession they can be obtained from a source that is more convenient, less
2 burdensome, or less expensive.

3 **RESPONSE TO REQUEST NO. 16:**

4 Without waiving these objections, Plaintiff states that in response to this cumulative
5 request, he will produce all documents in his possession relating to his employment with
6 Defendant.
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9 **REQUEST FOR PRODUCTION NO. 17:**

10 All documents, including, but not limited to pay records, pay checks, pay stubs,
11 IRS W-2 forms, memos, letters, and/or tax returns, that relate to, refer to, show, or reflect the
12 wages, including commissions, promised, earned or paid to Plaintiff while employed by HMCU.
13

14 **OBJECTION:**

15 Plaintiff objects to this request on the grounds that it is over broad, unduly
16 burdensome, cumulative, seeks information that is not relevant to a claim or defense or reasonably
17 calculated to lead to the discovery of admissible evidence. Further, because the documents
18 relating to Plaintiff's employment – including all compensation information - are in Defendant's
19 possession they can be obtained from a source that is more convenient, less burdensome, or less
20 expensive.
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22 **RESPONSE TO REQUEST NO. 17:**

23 Without waiving these objections, Plaintiff states that in response to this unduly
24 burdensome, overly broad and cumulative request, he will produce all pay records and paystubs
25 in his possession relating to income earned from Defendant.
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27 **REQUEST FOR PRODUCTION NO. 18:**
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1 All documents, including but not limited to pay records, pay checks, pay stubs,
2 IRS W-2 forms, memos, letters, and/or tax returns, that relate to, refer to, show, or reflect the
3 benefits promised, earned or paid to Plaintiff while employed by HMCU.

4 **OBJECTION:**

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6 Plaintiff objects to this request on the grounds that it is over broad, unduly
7 burdensome, cumulative, seeks information that it not relevant to a claim or defense or reasonably
8 calculated to lead to the discovery of admissible evidence. Further, because the documents
9 relating to Plaintiff's employment – including all benefits information - are in Defendant's
10 possession they can be obtained from a source that is more convenient, less burdensome, or less
11 expensive.

12 **RESPONSE TO REQUEST NO. 18:**

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14 Without waiving these objections, Plaintiff states that in response to this unduly
15 burdensome, overly broad and cumulative request, he will produce all pay records and paystubs
16 in his possession relating all benefits paid or promised by Defendant.

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19 **REQUEST FOR PRODUCTION NO. 19:**

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21 All documents that relate to, refer to, show, or reflect any bonus programs or other
22 incentive compensation for which Plaintiff was eligible while employed by HMCU.

23 **OBJECTION:**

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25 Plaintiff objects to this request on the grounds that it is over broad, unduly
26 burdensome, cumulative, seeks information that it not relevant to a claim or defense or reasonably
27 calculated to lead to the discovery of admissible evidence. Further, because the documents
28 relating to Plaintiff's employment – including all compensation information - are in Defendant's

1 possession they can be obtained from a source that is more convenient, less burdensome, or less
2 expensive.

3 **RESPONSE TO REQUEST NO. 19:**

4 Without waiving these objections, Plaintiff states that in response to this unduly
5 burdensome, overly broad and cumulative request, he will produce all pay records and paystubs
6 in his possession relating to compensation paid by Defendant.
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9 **REQUEST FOR PRODUCTION NO. 20:**

10 All documents that relate to, refer to, show, or reflect any absences from work due
11 to sick days, personal days, doctor's appointments, leaves of absences, or for any other reason
12 requested and/or taken by Plaintiff while employed by HMCU.
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14 **OBJECTION:**

15 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
16 burdensome, and cumulative. Further, because the information sought is be in Defendant's
17 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
18 branch schedules, payroll, benefits, and leave records, and other documents identifying time and
19 date of work performed - it can be obtained from a source that is more convenient, less
20 burdensome, or less expensive.
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22 **RESPONSE TO REQUEST NO. 20:**

23 Without waiving these objections, Plaintiff states that in response to this overly
24 broad and cumulative request, he will produce all documents in his possession relating to his
25 employment with Defendant.
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27 **REQUEST FOR PRODUCTION NO. 21:**
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1 All documents that relate to, refer to, show, or reflect any vacations requested
2 and/or taken by Plaintiff while employed by HMCU including, without limitation, calendar
3 entries, receipts, credit card bills, airline ticket stubs, itineraries, etc.

4 **OBJECTION:**

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6 Plaintiff objects to this request on the grounds that it is over broad, vague, unduly
7 burdensome, and cumulative. Further, because the information sought is be in Defendant's
8 possession – particularly the server containing Plaintiff's and his supervisors' entire email files,
9 branch schedules, payroll, benefits, and leave records, and other documents identifying time and
10 date of work performed - it can be obtained from a source that is more convenient, less
11 burdensome, or less expensive.

12 **RESPONSE TO REQUEST NO. 21:**

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14 Without waiving these objections, Plaintiff states that in response to this overly
15 broad and cumulative request, he will produce all documents in his possession relating to his
16 employment with Defendant.

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18 **REQUEST FOR PRODUCTION NO. 22:**

19 All documents that relate to, refer to, show or reflect any earned income by
20 Plaintiff from HMCU, including, but without limitation, pay records, pay checks, pay stubs, IRS
21 W-2 forms, memos, and letters received at any time during Plaintiff's employment with HMCU.

22 **OBJECTION:**

23
24 Plaintiff objects to this request on the grounds that it is over broad, unduly
25 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
26 – including all compensation information - are in Defendant's possession they can be obtained
27 from a source that is more convenient, less burdensome, or less expensive.

1 **RESPONSE TO REQUEST NO. 22:**

2 Without waiving these objections, Plaintiff states that in response to this
3 cumulative request, he will produce all pay records and paystubs in his possession relating to
4 compensation paid by Defendant.
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7 **REQUEST FOR PRODUCTION NO. 23:**

8 All documents that relate to, refer to, show, or reflect all alleged deductions made
9 by HMCU from Plaintiff's wages, commission or incentives.

10 **OBJECTION:**

11 Plaintiff objects to this request on the grounds that it is over broad, unduly
12 burdensome, cumulative, seeks information that it not relevant to a claim or defense or reasonably
13 calculated to lead to the discovery of admissible evidence. Further, because the documents
14 relating to Plaintiff's employment – including all compensation information - are in Defendant's
15 possession they can be obtained from a source that is more convenient, less burdensome, or less
16 expensive.
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18 **RESPONSE TO REQUEST NO. 23:**

19 Without waiving these objections, Plaintiff states that in response to this unduly
20 burdensome, overly broad and cumulative request, he will produce all pay records and paystubs
21 in his possession relating to compensation paid by Defendant.
22

23
24 **REQUEST FOR PRODUCTION NO. 24:**

25 All documents, including, and without limitation, credit card receipts, cash
26 receipts, credit card bills, and cellular telephone bills, that relate to, refer to, show, or reflect all
27 expenses Plaintiff claims to have incurred in performing his duties while employed by HMCU.
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1 **OBJECTION:**

2 Plaintiff objects to this request on the grounds that it is over broad, unduly
3 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
4 – including all compensation information - are in Defendant's possession they can be obtained
5 from a source that is more convenient, less burdensome, or less expensive.
6

7 **RESPONSE TO REQUEST NO. 24:**

8 Without waiving these objections, Plaintiff states that in response to this unduly
9 burdensome, overly broad and cumulative request, he will produce all pay records and paystubs
10 in his possession relating to compensation paid and deductions made by Defendant.
11

12 **REQUEST FOR PRODUCTION NO. 25:**

13 All documents, including, and without limitation, cellular telephone bills, cellular
14 telephone records, personal digital assistant bills, and personal digital assistant records, that relate
15 to, refer to, show, or reflect all telephone calls made and received, all text, SMS, or PIN messages
16 sent or received, all pages sent or received, and any and all other communications sent or received
17 from or by the cellular telephone number(s) Plaintiff uses or has used to perform work for
18 HMCU.
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20 **OBJECTION:**

21 Plaintiff objects to this request on the grounds that it is over broad, unduly
22 burdensome, seeks information that it not relevant to a claim or defense or reasonably calculated
23 to lead to the discovery of admissible evidence. Further, because the documents relating to
24 Plaintiff's job duties and hours worked – including the servers containing Plaintiff's and his
25 supervisors' email files, phone records, and expense reimbursement materials - are in Defendant's
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1 possession, the information can be obtained from a source that is more convenient, less
2 burdensome, or less expensive.

3 **RESPONSE TO REQUEST NO. 25:**

4 Plaintiff will not provide the documents requested in this request.

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7 **REQUEST FOR PRODUCTION NO. 26:**

8 All documents, including, and without limitation, telephone bills and telephone
9 records, that relate to, refer to, show, or reflect all telephone calls made and received, all text,
10 SMS, or PIN messages sent or received, all pages sent or received, and any and all other
11 communications sent or received from or by any personal or home telephone number(s) Plaintiff
12 uses or has used to perform work for HMCU.

13
14 **OBJECTION:**

15 Plaintiff objects to this request on the grounds that it is over broad, unduly
16 burdensome, seeks information that it not relevant to a claim or defense or reasonably calculated
17 to lead to the discovery of admissible evidence. Further, because the documents relating to
18 Plaintiff's job duties and hours worked – including the servers containing Plaintiff's and his
19 supervisors' email files, phone records, and expense reimbursement materials - are in Defendant's
20 possession, the information can be obtained from a source that is more convenient, less
21 burdensome, or less expensive.

22
23 **RESPONSE TO REQUEST NO. 26:**

24 Plaintiff will not provide the documents requested in this request.

25
26 **REQUEST FOR PRODUCTION NO. 27:**

1 All documents, including, and without limitation, cellular telephone bills, cellular
2 telephone records, personal digital assistant bills, and personal digital assistant records, that relate
3 to, refer to, show, or reflect all telephone calls made and received, all text, SMS, or PIN messages
4 sent or received, and any and all other communications sent or received from or by any personal
5 digital assistant device Plaintiff uses or has used to perform work for HMCU.
6

7 **OBJECTION:**

8 Plaintiff objects to this request on the grounds that it is over broad, unduly
9 burdensome, seeks information that it not relevant to a claim or defense or reasonably calculated
10 to lead to the discovery of admissible evidence. Further, because the documents relating to
11 Plaintiff's job duties and hours worked -- including the servers containing Plaintiff's and his
12 supervisors' email files, phone records, and expense reimbursement materials - are in Defendant's
13 possession, the information can be obtained from a source that is more convenient, less
14 burdensome, or less expensive.
15

16 **RESPONSE TO REQUEST NO. 27:**

17 Plaintiff will not provide the documents requested in this request.
18

19 **REQUEST FOR PRODUCTION NO. 28:**

20 All documents, including, and without limitation, pager bills and pager records,
21 that relate to, refer to, show, or reflect all pages sent and received and any and all other
22 communications sent or received from or by any pager Plaintiff uses or has used to perform work
23 for HMCU.
24

25 **OBJECTION:** Plaintiff objects to this request on the grounds that it is over broad, unduly
26 burdensome, seeks information that it not relevant to a claim or defense or reasonably calculated
27 to lead to the discovery of admissible evidence. Further, because the documents relating to
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1 Plaintiff's job duties and hours worked – including the servers containing Plaintiff's and his
2 supervisors' email files, phone records, and expense reimbursement materials - are in Defendant's
3 possession, the information can be obtained from a source that is more convenient, less
4 burdensome, or less expensive.

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6 **RESPONSE TO REQUEST NO. 28:**

7 Plaintiff will not provide the documents requested in this request.

8
9 **REQUEST FOR PRODUCTION NO. 29:**

10 All calendars, calendar entries, diaries, day-timers, day planners, time records,
11 notes, memoranda, training schedules, work schedules or similar documents covering the period
12 of Plaintiff's employment with HMCU to present, which in any manner relate to Plaintiff's hours
13 of work, working assignments, rate of pay, wages, compensation, commissions and/or other
14 working conditions while employed by HMCU.

15
16 **OBJECTION:**

17 Plaintiff objects to this request on the grounds that it is over broad, unduly
18 burdensome. Further, because the documents relating to Plaintiff's job duties, hours worked and
19 compensation are in Defendant's possession, the information can be obtained from a source that
20 is more convenient, less burdensome, or less expensive.

21
22 **RESPONSE TO REQUEST NO. 29:**

23 Without waiving these objections, Plaintiff states that in response to this overly broad
24 request, he will produce all documents in his possession relating to his employment with
25 Defendant.

26
27 **REQUEST FOR PRODUCTION NO. 30:**

1 All documents reflecting communications or correspondence that Plaintiff and/or
2 his counsel has had with former and/or current employees of HMCU that relate or refer to the
3 claims alleged in the First Amended Complaint.

4 **OBJECTION:**

5 Plaintiff objects to this requests on the grounds that it is vague, overly
6 burdensome, seeks information protected by the attorney work-product doctrine, and seeks
7 "statements" beyond that which is contemplated by Rule 26 of the Federal Rules of Civil
8 Procedure.

9 **RESPONSE TO REQUEST NO. 30:**

10 Without waiving these objections, Plaintiff states that as part of his motions filed
11 with the Court, he has produced to Defendant all "statements" as defined by Rule 26 of the
12 Federal Rules of Civil Procedure.

13 **REQUEST FOR PRODUCTION NO. 31:**

14 All documents reflecting communication or correspondence that Plaintiff and/or
15 his counsel has had with any individual that relate or refer to the claims alleged in the First
16 Amended Complaint.

17 **OBJECTION:**

18 Plaintiff objects to this requests on the grounds that it is vague, overly
19 burdensome, cumulative, seeks information protected by the attorney work-product doctrine, and
20 seeks "statements" beyond that which is contemplated by Rule 26 of the Federal Rules of Civil
21 Procedure.

22 **RESPONSE TO REQUEST NO. 31:**

1 Without waiving these objections, Plaintiff states that as part of his motions filed
2 with the Court, he has produced to Defendant all "statements" as defined by Rule 26 of the
3 Federal Rules of Civil Procedure.

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6 **REQUEST FOR PRODUCTION NO. 32:**

7 All documents that relate to, refer to or show any written or recorded statements
8 obtained or received by Plaintiff and/or his counsel from any of HMCU's former and/or current
9 employees concerning the subject matter of this lawsuit.

10 **OBJECTION:**

11 Plaintiff objects to this requests on the grounds that it is vague, overly
12 burdensome, cumulative, seeks information protected by the attorney work-product doctrine, and
13 seeks "statements" beyond that which is contemplated by Rule 26 of the Federal Rules of Civil
14 Procedure.
15

16 **RESPONSE TO REQUEST NO. 32:**

17 Without waiving these objections, Plaintiff states that as part of his motions filed
18 with the Court, he has produced to Defendant all "statements" as defined by Rule 26 of the
19 Federal Rules of Civil Procedure.
20

21
22 **REQUEST FOR PRODUCTION NO. 33:**

23 All documents that relate to, refer to or show any written or recorded statements
24 obtained or received by Plaintiff and/or his counsel from any individual concerning the subject
25 matter of this lawsuit.
26

27 **OBJECTION:**
28

1 Plaintiff objects to this requests on the grounds that it is vague, overly
2 burdensome, cumulative, seeks information protected by the attorney work-product doctrine, and
3 seeks "statements" beyond that which is contemplated by Rule 26 of the Federal Rules of Civil
4 Procedure.

5
6 **RESPONSE TO REQUEST NO. 33:**

7 Without waiving these objections, Plaintiff states that as part of his motions filed
8 with the Court, he has produced to Defendant all "statements" as defined by Rule 26 of the
9 Federal Rules of Civil Procedure.

10
11 **REQUEST FOR PRODUCTION NO. 34:**

12 All documents that refer to, support, or reflect your typical daily tasks for each
13 position you hold or held while employed with HMCU.

14
15 **OBJECTION:**

16 Plaintiff objects to this request on the grounds that it is over broad, unduly
17 burdensome, and cumulative. Further, because the documents relating to Plaintiff's typical daily
18 tasks – including the servers containing Plaintiff's and his supervisors' email files, phone records,
19 and expense reimbursement materials - are in Defendant's possession, the information can be
20 obtained from a source that is more convenient, less burdensome, or less expensive.

21
22 **RESPONSE TO REQUEST NO. 34:**

23 Without waiving these objections, Plaintiff states that in response to this overly
24 broad and cumulative request, he will produce all documents in his possession relating to his
25 employment with Defendant.

26
27 **REQUEST FOR PRODUCTION NO. 35:**

1 All documents that refer to, support, or reflect your typical weekly tasks for each
2 position you hold or held while employed with HMCU.

3 **OBJECTION:**

4 Plaintiff objects to this request on the grounds that it is over broad, unduly
5 burdensome, and cumulative. Further, because the documents relating to Plaintiff's typical
6 weekly tasks – including the servers containing Plaintiff's and his supervisors' email files, phone
7 records, and expense reimbursement materials - are in Defendant's possession, the information
8 can be obtained from a source that is more convenient, less burdensome, or less expensive.

9
10 **RESPONSE TO REQUEST NO. 35:**

11 Without waiving these objections, Plaintiff states that in response to this overly
12 broad and cumulative request, he will produce all documents in his possession relating to his
13 employment with Defendant.
14

15
16 **REQUEST FOR PRODUCTION NO. 36:**

17 All documents which in any manner relate or refer to each and every instance for
18 which you claim that you did not receive appropriate compensation, including but not limited to
19 overtime, penalties, fines, and premium pay, from HMCU in violation of any state or federal law,
20 including but not limited to the Fair Labor Standards Act.

21 **OBJECTION:**

22 Plaintiff objects to this request on the grounds that it is over broad, unduly
23 burdensome, and cumulative. Further, because the documents relating to Plaintiff's
24 compensation – including payroll and compensation records - are in Defendant's possession, the
25 information can be obtained from a source that is more convenient, less burdensome, or less
26 expensive.
27
28

1 **RESPONSE TO REQUEST NO. 36:**

2 Without waiving these objections, Plaintiff states that in response to this overly
3 broad and cumulative request, he will produce all documents in his possession relating to his
4 employment with Defendant.
5

6
7 **REQUEST FOR PRODUCTION NO. 37:**

8 All documents which in any manner relate to or refer to itemized wage statements
9 provided to you by HMCU, including but not limited to pay records, pay checks, and pay stubs.

10 **OBJECTION:**

11 Plaintiff objects to this request on the grounds that it is over broad, unduly
12 burdensome, and cumulative. Further, because the documents relating to Plaintiff's
13 compensation -- including pay records, pay checks, and pay stubs - the information can be
14 obtained from a source that is more convenient, less burdensome, or less expensive.
15

16 **RESPONSE TO REQUEST NO. 37:**

17 Without waiving these objections, Plaintiff states that in response to this overly
18 broad and cumulative request, he will produce all documents in his possession relating to his
19 employment with Defendant.
20

21
22 **REQUEST FOR PRODUCTION NO. 38:**

23 All documents that in any manner refer to, relate to, tend to prove or disprove your
24 contention that the "loan officers" described in the First Amended Complaint were misclassified
25 as exempt.

26 **OBJECTION:**
27
28

1 Plaintiff objects to this request on the grounds that it is over broad, unduly
2 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
3 and Defendant's pay policies and practices are in Defendant's possession, the information can be
4 obtained from a source that is more convenient, less burdensome, or less expensive.

5
6 **RESPONSE TO REQUEST NO. 38:**

7 Without waiving these objections, Plaintiff states that in response to this overly
8 broad and cumulative request, he will produce all documents in his possession relating to his
9 employment with Defendant.

10
11 **REQUEST FOR PRODUCTION NO. 39:**

12 All documents that in any manner refer to, relate to, tend to prove or disprove your
13 contention that that "loan officers" described in the First Amended Complaint were denied or not
14 fully paid overtime compensation.

15
16 **OBJECTION:**

17 Plaintiff objects to this request on the grounds that it is over broad, unduly
18 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
19 and Defendant's pay policies and practices are in Defendant's possession, the information can be
20 obtained from a source that is more convenient, less burdensome, or less expensive.

21
22 **RESPONSE TO REQUEST NO. 39:**

23 Without waiving these objections, Plaintiff states that in response to this overly
24 broad and cumulative request, he will produce all documents in his possession relating to his
25 employment with Defendant.

26
27 **REQUEST FOR PRODUCTION NO. 40:**

1 All documents that in any manner refer to, relate to, tend to prove or disprove your
2 contention that the "loan officers" described in the First Amended Complaint were denied or
3 prevented from taking meal and rest periods.

4 **OBJECTION:**

5 Plaintiff objects to this request on the grounds that it is over broad, unduly
6 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
7 and Defendant's pay policies and practices are in Defendant's possession, the information can be
8 obtained from a source that is more convenient, less burdensome, or less expensive.

9 **RESPONSE TO REQUEST NO. 40:**

10 Without waiving these objections, Plaintiff states that in response to this overly
11 broad and cumulative request, he will produce all documents in his possession relating to his
12 employment with Defendant.
13
14

15 **REQUEST FOR PRODUCTION NO. 41:**

16 All documents that in any manner refer to, relate to, tend to prove or disprove your
17 contention that the "loan officers" described in the First Amended Complaint were not provided
18 appropriate waiting time penalties pursuant to the California Labor Code.
19

20 **OBJECTION:**

21 Plaintiff objects to this request on the grounds that it is over broad, unduly
22 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
23 and Defendant's pay policies and practices are in Defendant's possession, the information can be
24 obtained from a source that is more convenient, less burdensome, or less expensive.
25

26 **RESPONSE TO REQUEST NO. 41:**

1 Without waiving these objections, Plaintiff states that in response to this overly
2 broad and cumulative request, he will produce all documents in his possession relating to his
3 employment with Defendant.
4

5
6
7 **REQUEST FOR PRODUCTION NO. 42:**

8 All documents that in any manner refer to, relate to, tend to prove or disprove your
9 contention that the "loan officers" described in the First Amended Complaint were not provided
10 with properly itemized wage statements pursuant to the California Labor Code.
11

12 **OBJECTION:**

13 Plaintiff objects to this request on the grounds that it is over broad, unduly
14 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
15 and Defendant's pay policies and practices are in Defendant's possession, the information can be
16 obtained from a source that is more convenient, less burdensome, or less expensive.

17 **RESPONSE TO REQUEST NO. 42:**

18 Without waiving these objections, Plaintiff states that in response to this overly
19 broad and cumulative request, he will produce all documents in his possession relating to his
20 employment with Defendant.
21

22
23 **REQUEST FOR PRODUCTION NO. 43:**

24 All documents that in any manner refer to, tend to prove or disprove your
25 contention that the "sales assistants" described in the First Amended Complaint were not paid
26 fully for overtime hours worked.
27

1 **OBJECTION:**

2 Plaintiff objects to this request on the grounds that it is over broad, unduly
3 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
4 and Defendant's pay policies and practices are in Defendant's possession, the information can be
5 obtained from a source that is more convenient, less burdensome, or less expensive.
6

7 **RESPONSE TO REQUEST NO. 43:**

8 Without waiving these objections, Plaintiff states that in response to this overly
9 broad and cumulative request, he will produce all documents in his possession relating to his
10 employment with Defendant.
11

12 **REQUEST FOR PRODUCTION NO. 44:**

13 All documents that in any manner refer to, relate to, tend to prove or disprove your
14 contention that the "sales assistants" described in the First Amended Complaint were denied or
15 prevented from taking meal and rest periods.
16

17 **OBJECTION:**

18 Plaintiff objects to this request on the grounds that it is over broad, unduly
19 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
20 and Defendant's pay policies and practices are in Defendant's possession, the information can be
21 obtained from a source that is more convenient, less burdensome, or less expensive.
22

23 **RESPONSE TO REQUEST NO. 44:**

24 Without waiving these objections, Plaintiff states that in response to this overly
25 broad and cumulative request, he will produce all documents in his possession relating to his
26 employment with Defendant.
27

1 **REQUEST FOR PRODUCTION NO. 45:**

2 All documents that in any manner refer to, relate to, tend to prove or disprove your
3 contention that the "sales assistants" described in the First Amended Complaint were not
4 provided appropriate waiting time penalties pursuant to the California Labor Code.
5

6 **OBJECTION:**

7 Plaintiff objects to this request on the grounds that it is over broad, unduly
8 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
9 and Defendant's pay policies and practices are in Defendant's possession, the information can be
10 obtained from a source that is more convenient, less burdensome, or less expensive.

11 **RESPONSE TO REQUEST NO. 45:**

12 Without waiving these objections, Plaintiff states that in response to this overly
13 broad and cumulative request, he will produce all documents in his possession relating to his
14 employment with Defendant.
15

16
17 **REQUEST FOR PRODUCTION NO. 46:**

18 All documents that in any manner refer to, relate to, tend to prove or disprove your
19 contention that the "sales assistants" described in the First Amended Complaint were not
20 provided with properly itemized wage statements pursuant to the California Labor Code.
21

22 **OBJECTION:**

23 Plaintiff objects to this request on the grounds that it is over broad, unduly
24 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
25 and Defendant's pay policies and practices are in Defendant's possession, the information can be
26 obtained from a source that is more convenient, less burdensome, or less expensive.
27

28 **RESPONSE TO REQUEST NO. 46:**

1 Without waiving these objections, Plaintiff states that in response to this overly
2 broad and cumulative request, he will produce all documents in his possession relating to his
3 employment with Defendant.
4

5
6
7 **REQUEST FOR PRODUCTION NO. 47:**

8 All documents that in any manner refer to, relate to, tend to prove or disprove your
9 contention that the "other non-management sales employees" described in the First Amended
10 Complaint were misclassified as exempt.

11 **OBJECTION:**

12 Plaintiff objects to this request on the grounds that it is over broad, unduly
13 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
14 and Defendant's pay policies and practices are in Defendant's possession, the information can be
15 obtained from a source that is more convenient, less burdensome, or less expensive.
16

17 **RESPONSE TO REQUEST NO. 47:**

18 Without waiving these objections, Plaintiff states that in response to this overly
19 broad and cumulative request, he will produce all documents in his possession relating to his
20 employment with Defendant.
21

22
23 **REQUEST FOR PRODUCTION NO. 48:**

24 All documents that in any manner refer to, relate to, tend to prove or disprove your
25 contention that the "other non-management sales employees" described in the First Amended
26 Complaint were denied or not fully paid overtime compensation.
27

28 **OBJECTION:**

1 Plaintiff objects to this request on the grounds that it is over broad, unduly
2 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
3 and Defendant's pay policies and practices are in Defendant's possession, the information can be
4 obtained from a source that is more convenient, less burdensome, or less expensive.

5
6 **RESPONSE TO REQUEST NO. 48:**

7 Without waiving these objections, Plaintiff states that in response to this overly
8 broad and cumulative request, he will produce all documents in his possession relating to his
9 employment with Defendant.

10
11 **REQUEST FOR PRODUCTION NO. 49:**

12 All documents that in any manner refer to, relate to, tend to prove or disprove your
13 contention that the "other non-management sales employees" described in the First Amended
14 Complaint were denied or prevented from taking meal and rest period.

15
16 **OBJECTION:**

17 Plaintiff objects to this request on the grounds that it is over broad, unduly
18 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
19 and Defendant's pay policies and practices are in Defendant's possession, the information can be
20 obtained from a source that is more convenient, less burdensome, or less expensive.

21
22 **RESPONSE TO REQUEST NO. 49:**

23 Without waiving these objections, Plaintiff states that in response to this overly
24 broad and cumulative request, he will produce all documents in his possession relating to his
25 employment with Defendant.

26
27 **REQUEST FOR PRODUCTION NO. 50:**

1 All documents that in any manner refer to, relate to, tend to prove or disprove your
2 contention that the "other non-management sales employees" described in the First Amended
3 Complaint were not provided appropriate waiting time penalties pursuant to the California Labor
4 Code.

5
6 **OBJECTION:**

7 Plaintiff objects to this request on the grounds that it is over broad, unduly
8 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
9 and Defendant's pay policies and practices are in Defendant's possession, the information can be
10 obtained from a source that is more convenient, less burdensome, or less expensive.

11 **RESPONSE TO REQUEST NO. 50:**

12 Without waiving these objections, Plaintiff states that in response to this overly
13 broad and cumulative request, he will produce all documents in his possession relating to his
14 employment with Defendant.
15

16
17 **REQUEST FOR PRODUCTION NO. 51:**

18 All documents that in any manner refer to, relate to, tend to prove or disprove your
19 contention that the "other non-management sales employees" described in the First Amended
20 Complaint were not provided with properly itemized wage statements pursuant to the California
21 Labor Code.
22

23 **OBJECTION:**

24 Plaintiff objects to this request on the grounds that it is over broad, unduly
25 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
26 and Defendant's pay policies and practices are in Defendant's possession, the information can be
27 obtained from a source that is more convenient, less burdensome, or less expensive.
28

1 **RESPONSE TO REQUEST NO. 51:**

2 Without waiving these objections, Plaintiff states that in response to this overly
3 broad and cumulative request, he will produce all documents in his possession relating to his
4 employment with Defendant.
5

6
7 **REQUEST FOR PRODUCTION NO. 52:**

8 All documents that in any manner refer to, relate to, tend to prove or disprove your
9 contention that HMCU suffered and permitted Plaintiffs, Class Members and/or the Collective
10 Class to work more than forty hours per week without overtime compensation.
11

12 **OBJECTION:**

13 Plaintiff objects to this request on the grounds that it is over broad, unduly
14 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
15 and Defendant's pay policies and practices are in Defendant's possession, the information can be
16 obtained from a source that is more convenient, less burdensome, or less expensive.

17 **RESPONSE TO REQUEST NO. 52:**

18 Without waiving these objections, Plaintiff states that in response to this overly
19 broad and cumulative request, he will produce all documents in his possession relating to his
20 employment with Defendant.
21

22
23 **REQUEST FOR PRODUCTION NO. 53:**

24 All documents that in any manner refer to, relate to, tend to prove or disprove your
25 contention that HMCU has engaged in conduct that is or was willful and in bad faith, causing
26 significant damages to Plaintiff, Class Members and/or the Collective Class.
27

28 **OBJECTION:**

1 Plaintiff objects to this request on the grounds that it is over broad, unduly
2 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
3 and Defendant's pay policies and practices are in Defendant's possession, the information can be
4 obtained from a source that is more convenient, less burdensome, or less expensive.
5

6 **RESPONSE TO REQUEST NO. 53:**

7 Without waiving these objections, Plaintiff states that in response to this overly
8 broad and cumulative request, he will produce all documents in his possession relating to his
9 employment with Defendant.
10

11 **REQUEST FOR PRODUCTION NO. 54:**

12 All documents that in any manner refer to, relate to, tend to prove or disprove your
13 contention that HMCU has failed to provide Plaintiff and/or Class Members with meal periods as
14 required by law.
15

16 **OBJECTION:**

17 Plaintiff objects to this request on the grounds that it is over broad, unduly
18 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
19 and Defendant's pay policies and practices are in Defendant's possession, the information can be
20 obtained from a source that is more convenient, less burdensome, or less expensive.
21

22 **RESPONSE TO REQUEST NO. 54:**

23 Without waiving these objections, Plaintiff states that in response to this overly
24 broad and cumulative request, he will produce all documents in his possession relating to his
25 employment with Defendant.
26

27 **REQUEST FOR PRODUCTION NO. 55:**
28

1 All documents that in any manner refer to, relate to, tend to prove or disprove your
2 contention that HMCU failed to authorize and permit Plaintiff and/or Class Members to take rest
3 periods as required by law.

4 **OBJECTION:**

5
6 Plaintiff objects to this request on the grounds that it is over broad, unduly
7 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
8 and Defendant's pay policies and practices are in Defendant's possession, the information can be
9 obtained from a source that is more convenient, less burdensome, or less expensive.

10 **RESPONSE TO REQUEST NO. 55:**

11 Without waiving these objections, Plaintiff states that in response to this overly
12 broad and cumulative request, he will produce all documents in his possession relating to his
13 employment with Defendant.
14

15
16 **REQUEST FOR PRODUCTION NO. 56:**

17 All documents reflecting communications or correspondence to or from any
18 government entity that relate or refer to the claims alleged in the First Amended Complaint.

19 **OBJECTION:**

20
21 Plaintiff objects to this request on the grounds that it is over broad, unduly
22 burdensome, cumulative, seeks information that it not relevant to a claim or defense or reasonably
23 calculated to lead to the discovery of admissible evidence. Further, because the documents
24 relating to Plaintiff's employment – including communications with government entities - are in
25 Defendant's possession, the information can be obtained from a source that is more convenient,
26 less burdensome, or less expensive.

27 **RESPONSE TO REQUEST NO. 56:**

1 Without waiving these objections, Plaintiff states that in response to this overly
2 broad and cumulative request, he will produce all documents in his possession relating to his
3 employment with Defendant.
4

5
6
7 **REQUEST FOR PRODUCTION NO. 57:**

8 All documents that relate to, refer to, show or reflect any and all claims submitted
9 to, or communications with, federal, state or local government agencies or entities and Plaintiff
10 regarding HMCU.

11 **OBJECTION:**

12 Plaintiff objects to this request on the grounds that it is over broad, unduly
13 burdensome, cumulative, seeks information that it not relevant to a claim or defense or reasonably
14 calculated to lead to the discovery of admissible evidence. Further, because the documents
15 relating to Plaintiff's employment – including communications with government entities - are in
16 Defendant's possession, the information can be obtained from a source that is more convenient,
17 less burdensome, or less expensive.
18

19 **RESPONSE TO REQUEST NO. 57:**

20 Without waiving these objections, Plaintiff states that in response to this overly
21 broad and cumulative request, he will produce all documents in his possession relating to his
22 employment with Defendant.
23

24
25 **REQUEST FOR PRODUCTION NO. 58:**

26 All documents, including, but without limitation, written warnings, electronic mail
27 messages, memoranda, and Interim Job Discussions, that relate to, refer to, show or reflect any
28

1 performance related corrective action, counseling, or discipline that Plaintiff received during his
2 employment with HMCU.

3 **OBJECTION:**

4 Plaintiff objects to this request on the grounds that it is over broad, unduly
5 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
6 are in Defendant's possession, the information can be obtained from a source that is more
7 convenient, less burdensome, or less expensive.
8

9 **RESPONSE TO REQUEST NO. 58:**

10 Without waiving these objections, Plaintiff states that in response to this overly
11 broad and cumulative request, he will produce all documents in his possession relating to his
12 employment with Defendant.
13

14
15 **REQUEST FOR PRODUCTION NO. 59:**

16 All documents that in any manner refer to, relate to, tend to prove or disprove
17 Plaintiff's contention in the First Amended Complaint that Plaintiff's work productivity was
18 comparable to that of his colleagues.
19

20
21 **OBJECTION:**

22 Plaintiff objects to this request on the grounds that it is over broad, unduly
23 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
24 as compared to his colleagues are in Defendant's possession, the information can be obtained
25 from a source that is more convenient, less burdensome, or less expensive.
26

27 **RESPONSE TO REQUEST NO. 59:**
28

1 Without waiving these objections, Plaintiff states that in response to this overly
2 broad and cumulative request, he will produce all documents in his possession relating to his
3 employment with Defendant.

4
5
6 **REQUEST FOR PRODUCTION NO. 60:**

7 All documents that in any manner refer to, relate to, tend to prove or disprove
8 Plaintiff's contention in the First Amended Complaint that HMCU acknowledged any wage
9 violation in any proceeding that occurred under the California Labor Commissioner's jurisdiction.

10 **OBJECTION:**

11 Plaintiff objects to this request on the grounds that it is over broad, unduly
12 burdensome, and cumulative. Further, because the documents relating to Defendant's
13 communications with the California Labor Commissioner are in Defendant's possession, the
14 information can be obtained from a source that is more convenient, less burdensome, or less
15 expensive.

16
17 **RESPONSE TO REQUEST NO. 60:**

18 Without waiving these objections, Plaintiff states that in response to this overly
19 broad and cumulative request, he will produce all documents in his possession relating to his
20 employment with Defendant.

21
22
23 **REQUEST FOR PRODUCTION NO. 61:**

24 All documents that in any manner refer to, relate to, tend to prove or disprove
25 Plaintiff's contention in the First Amended Complaint that Plaintiff was discharged from
26 employment by HMCU in retaliation for Plaintiff's protected activities under the Fair Labor
27 Standards Act and through the California Department of Labors Standards Enforcement.

1 **OBJECTION:**

2 Plaintiff objects to this request on the grounds that it is over broad, unduly
3 burdensome, and cumulative. Further, because the documents relating to Plaintiff's employment
4 are in Defendant's possession, the information can be obtained from a source that is more
5 convenient, less burdensome, or less expensive.
6

7 **RESPONSE TO REQUEST NO. 61:**

8 Without waiving these objections, Plaintiff states that in response to this overly
9 broad and cumulative request, he will produce all documents in his possession relating to his
10 employment with Defendant.
11

12
13
14 February 29, 2008

NICHOLS KASTER & ANDERSON, LLP

15 /s/

16
17 Paul J. Lukas
18 4600 IDS Center,
19 80 South 8th Street
20 Minneapolis, MN 55402
T: 612-256-3200
F: 612-215-6870

21 **ATTORNEYS FOR PLAINTIFFS**
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Wong et al v. HSBC Mortgage Corporation et al
Case No. 07-2446 MMC/JSC

I hereby certify that on February 29, 2008, I caused the following document(s):

Plaintiff Chaussy's Responses to Defendant's Requests for Production of Documents, Set I and CD containing the following:

NKA1501:	Weekly Production by Offices;
NKA2104:	F. Chaussy's W-2 for 2006;
NKA2258-2259:	Interim Job Discussion;
NKA2260-2269:	Status Report by Loan Officer;
NKA2270- 2275:	Retaliation Complaint;
NKA2276-2277:	Termination Letter;
NKA2278-2279:	Key Accountabilities;
NKA2280-2298:	Compensation History2298;
NKA2299-2300:	Inside HR – Overtime;
NKA2301-2305:	Correspondence with HSBC;
NKA2306-2307:	Employment Offer;
NKA2308-2322:	Mortgage Sales Incentive Plans for Retail Sales;
NKA2323-2327:	Final Written Warning-Production/Performance and Emails;
NKA2328-2329:	Emails Concerning Compensation;
NKA2330:	Emails with A. Ku;
NKA2331-2334:	Emails with W. Daniel;
NKA2334-2341:	Documents Relating to California Labor Commission Claim;
NKA2342-2356:	Emails with A. Ku and J. Jennings;
NKA2357-2360:	Branch Schedule Documents;
NKA2361-2365:	Emails with A. Ku and W. Daniel;
NKA2379-2382:	Paychecks and 2007 W-2;
NKA2386-2446:	F. Chaussy Paychecks;
NKA2447-2464:	Severance Pay Plan, Emails; and
NKA2465-2502:	Emails, Branch Schedule

to be served via hand-delivery to the following:

George J. Tichy, II
Michelle Barrett
Littler Mendelson, P.C.
650 California Street
20th Floor
San Francisco, CA 94108-2693

1
2 Dated: February 29, 2008

NICHOLS KASTER & ANDERSON, LLP

3
4 s/ Brad Heitzinger

5 Brad Heitzinger

6 Class Action Clerk

NICHOLS KASTER & ANDERSON, LLP

7 One Embarcadero Center

8 Suite 720

9 San Francisco, CA 94111

10 Telephone (415) 277-7235

11 Facsimile (415) 277-7238
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EXHIBIT K

1 Donald H. Nichols, MN State Bar No. 78918
(admitted pro hac vice)

2 Paul J. Lukas, MN State Bar No. 22084X
(admitted pro hac vice)

3 NICHOLS KASTER & ANDERSON, PLLP
4 4600 IDS Center
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6 Matthew C. Helland, CA State Bar No. 250451
NICHOLS KASTER & ANDERSON, LLP
7 One Embarcadero Center, Ste. 720
San Francisco, CA 94111

8 Attorneys for Individual and Representative Plaintiffs

9 **IN THE UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 Philip Wong, Frederic Chaussy, and Leslie
12 Marie Shearn, individually, on behalf of all
13 others similarly situated, and on behalf of
the general public,

Plaintiff,

14 v.

15 HSBC Mortgage Corporation (USA);
16 HSBC Bank USA, N.A.; and DOES 1
through 50, inclusive,

17 Defendant.

Case No: 07-cv-2446 MMC

**PLAINTIFF PHILIP WONG'S
PRIVILEGE LOG**

20
21 TO: HSBC Mortgage Corporation (USA); HSBC Bank USA, N.A., and their attorneys of record:

22
23 PLEASE TAKE NOTICE THAT Plaintiff Wong has withheld the documents listed on the
24 attached table (**ATTACHMENT 1**) on the grounds that production of these documents would
25 reveal the contents of communications protected by the attorney-client privilege and the attorney
26 work-product doctrine. Listed documents may include numerous communications embedded
27 within them (as in an "email chain"), may contain duplicative copies of the same communication,
28 and may be redacted where documents contained both communications including Mr. Wong and

1 communications which did not include Mr. Wong. Plaintiffs reserve the right to supplement this
2 privilege log at any time. Discovery is continuing.
3

4 Dated: May 13, 2008

NICHOLS KASTER & ANDERSON, LLP

5
6 s/Bryan J. Schwartz

7 Bryan J. Schwartz, CA Bar No. 209903
8 One Embarcadero Center
9 Suite 720
10 San Francisco, CA 94111

11 ATTORNEYS FOR PLAINTIFFS
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Attachment 1

Attorney-client Privilege e-mail log

Bates Number (s)	Subject line	Author	Recipient	Date
NKA006005-6006	fw: Dress Code at Montgomery Branch	Phil Wong	B. Schwartz, P. Lukas	1/23/2008
NKA006007-6008	fw: Discussion Today	Phil Wong	P. Lukas	2/1/2008
NKA006009	fw: Invitation: Action plan discussed	Phil Wong	B. Schwartz, P. Lukas	1/22/2008
NKA006010-6014	fw: Winter Credit Campaign	Phil Wong	B. Schwartz, P. Lukas	1/23/2008
NKA006015-6017	fw: contacts from HSBC	Phil Wong	B. Schwartz, F. Chaussy	4/20/2007
NKA006018-6023	fw: HSBC list	Frederic Chaussy	L. Lee, P. Wong, L. Kaster	5/23/2007
NKA006024	Inventory HSBC	Phil Wong	P. Lukas	2/29/2008
NKA006025	Resignation Letter	Phil Wong	P. Lukas, B. Schwartz	3/1/2008
NKA006026	no subject	Lucas Kaster	P. Wong	10/24/2007
NKA006027	re: cases	Bryan Schwartz	P. Wong	4/15/2008
NKA006028-6030	re: contacts from HSBC	Phil Wong	B. Schwartz	4/30/2007
NKA006031-6033	re: depositions	Bryan Schwartz	P. Wong	11/24/2007
NKA006034	re: Document (2) pdf	Phil Wong	B. Schwartz	7/17/2007
NKA006035-6036	re: Dress Code at Montgomery Branch	Phil Wong	P. Lukas	1/23/2008
NKA006037-6038	re: fw: Invitation Action plan	Bryan Schwartz	P. Wong, P. Lukas	1/22/2008
NKA006039-6042	re: fw: Loan Officer Branch Schedule- March 07	Phil Wong	B. Schwartz	5/30/2007
NKA006046-6048	re: HSBC list	Lawrence Lee	F. Chaussy, L. Kaster, P. Wong	5/16/2007
NKA006049	re: HSBC	Phil Wong	L. Kaster	6/20/2007
NKA006050-6054	re: JD Response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006055-6058	re: Job Positions	Phil Wong	L. Kaster	5/29/2007
NKA006059-6060	re: meeting next week	Frederic Chaussy	B. Schwartz, P. Wong	4/25/2007
NKA006063-6066	re: Phil, please take a close look	Phil Wong	B. Schwartz	12/17/2007
NKA006067-6069	re: resignation letter	Bryan Schwartz	P. Wong	3/3/2008
NKA006070-6071	re: retaliation	Bryan Schwartz	P. Wong	1/2/2008
NKA006072-6073	re: Tomorrow- Tuesday	Frederic Chaussy	B. Schwartz, P. Wong	4/21/2008
NKA006074-6076	wrong resignation letter	Phil Wong	B. Schwartz	3/4/2008
NKA006077-6080	re: Yesterday's Meeting!	Bryan Schwartz	F. Chaussy, P. Wong, L. Henry	5/8/2007
NKA006081-6083	re: (no subject)	Phil Wong	L. Kaster	10/30/2007
NKA006084-6087	HSBC	Bryan Schwartz	P. Wong	5/13/2008
NKA006088	re: HSBC	Bryan Schwartz	P. Wong	3/14/2008
NKA006089-6091	re: HSBC	Bryan Schwartz	P. Wong	5/13/2008
NKA006092-6093	re: HSBC	Bryan Schwartz	P. Wong	5/13/2008
NKA006094	re: HSBC	Bryan Schwartz	P. Wong	5/13/2008
NKA006095	re: HSBC	Bryan Schwartz	P. Wong	5/13/2008
NKA006096-6097	re: HSBC	Bryan Schwartz	L. Kaster, P. Wong	6/20/2007
NKA006098-6101	re: HSBC	Bryan Schwartz	P. Wong	5/13/2008
NKA006102-6104	re: HSBC	Phil Wong	P. Lukas	1/25/2008
NKA006105-6106	Re: HSBC	Paul Lukas	P. Wong	1/25/2008
NKA006107-6109	re: HSBC list	Bryan Schwartz	P. Wong, F. Chaussy	5/14/2007
NKA006110-6112	re: contacts from HSBC	Phil Wong	B. Schwartz	4/24/2007
NKA006113-6116	re: depositions	Lucas Kaster	P. Wong, F. Chaussy	11/1/2007
NKA006117-6118	Re: fw: Invitation action plan discussion	Bryan Schwartz	P. Wong, P. Lukas	1/22/2008
NKA006119-6122	re: HSBC list	Lawrence Lee	F. Chaussy, P. Wong, L. Kaster	5/23/2007

Attorney-client Privilege e-mail log

Bates Number (s)	Subject line	Author	Recipient	Date
NKA006123-6125	re: HSBC	Phil Wong	B. Schwartz	5/13/2008
NKA006126-6129	re: JD, Response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006130-6132	re: job positions	Phil Wong	L. Kaster, F. Chaussy	5/16/2007
NKA006133	re: meeting next week	Bryan Schwartz	P. Wong, F. Chaussy	4/24/2007
NKA006134-6136	re: Phil, please take a close look	Bryan Schwartz	P. Wong	12/17/2007
NKA006137-6140	re: resignation letter	Phil Wong	B. Schwartz	3/3/2008
NKA006141	re: wrong resignation letter	Bryan Schwartz	P. Wong	3/4/2008
NKA006142-6144	re: HSBC	Phil Wong	P. Lukas	1/25/2008
NKA006145-6146	re: HSBC	Paul Lukas	P. Wong	1/25/2008
NKA006147-6149	fw: HSBC list	Bryan Schwartz	P. Wong, F. Chaussy	5/14/2007
NKA006150-6153	re: contacts from HSBC	Phil Wong	B. Schwartz	5/3/2007
NKA006154-6155	re: fw: Invitation: Action Plan discussion	Bryan Schwartz	P. Wong, P. Lukas	1/22/2008
NKA006156-6159	re: HSBC list	Frederic Chaussy	P. Wong, L. Kaster	5/21/2007
NKA006160-6162	re: HSBC	Phil Wong	P. Lukas	2/29/2008
NKA006163-6169	JD, response required	Phil Wong	B. Schwartz	12/28/2007
NKA006170-6173	re: job positions	Phil Wong	L. Kaster, F. Chaussy	5/16/2007
NKA006174-6175	re: resignation letter	Phil Wong	B. Schwartz	3/3/2008
NKA006176-6180	re: HSBC list	Lucas Kaster	F. Chaussy, B. Schwartz, P. Wong	5/23/2007
NKA006181	re: HSBC	Bryan Schwartz	P. Wong, L. Kaster	6/20/2007
NKA006182-6184	re: JD, Response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006185-6188	re: resignation letter	Phil Wong	B. Schwartz	3/4/2008
NKA006189-6190	re: HSBC	Phil Wong	B. Schwartz	5/13/2008
NKA006191-6194	re: JD, Response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006195-6196	re: resignation letter	Phil Wong	P. Lukas	3/2/2008
NKA006197-6198	re: HSBC	Phil Wong	B. Schwartz	3/14/2008
NKA006199-6203	re: JD, response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006204-6207	re: resignation letter	Bryan Schwartz	P. Wong	3/4/2008
NKA006208-6209	re: HSBC	Phil Wong	B. Schwartz	7/19/2007
NKA006210-6214	re: JD, Response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006215	re: resignation letter	Bryan Schwartz	P. Lukas, P. Wong	3/3/2008
NKA006216-6218	re: HSBC	Phil Wong	B. Schwartz	5/13/2008
NKA006219-6223	re: JD, Response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006224-6226	re: resignation letter	Bryan Schwartz	P. Wong	3/3/2008
NKA006227-6228	re: HSBC	Phil Wong	L. Kaster	6/20/2007
NKA006229-6234	re: JD, Response required	Bryan Schwartz	P. Wong	12/28/2007
NKA006235	re: resignation letter	Paul Lukas	P. Wong, B. Schwartz	3/2/2008
NKA006238-6240	depositions	Lucas Kaster	P. Wong, F. Chaussy	10/31/2007
NKA006241-6242	Fwd: Dress Code at Montgomery Branch	Phil Wong	B. Schwartz, P. Lukas	1/13/2008
NKA006243-6244	Fwd: Fw: Confirmed: Retail Business plan, WebEx Training	Phil Wong	B. Schwartz	11/26/2007
NKA006245-6246	Fwd: Fw: Discussion Today	Phil Wong	P. Lukas	2/1/2008
NKA006247-6248	Fw: E-mail taglines promoting the premier delux and HE promo	Phil Wong	B. Schwartz	1/2/2008
NKA006249	fw: Invitation: Action Plan Discussion(Jan 23 2:00 PM PS in Montgomery Branch 10th floor	Phil Wong	P. Lukas, B. Schwartz	1/22/2008
NKA006250-6251	Fw: Loan Officer Branch Schedule-March 07	Phil Wong	B. Schwartz	5/30/2007

Attorney-client Privilege e-mail log

Bates Number (s)	Subject line	Author	Recipient	Date
NKA006252-6253	Fw: Rescheduled: Monthly Meeting- Conference Call (Nov 28 2:00 PM PST)	Phil Wong	B.Schwartz	11/26/2007
NKA006254-6258	Fw: Winter Credit Campaign	Phil Wong	P.Lukas, B.Schwartz	1/23/2008
NKA006259-6262	Fw: refinancing	Phil Wong	B.Schwartz	5/30/2007
NKA006263	Fw: big win for us	Bryan Schwartz	P. Wong, F. Chaussy, J. Henry	3/24/2008
NKA006264-6266	Fw: contacts from HSBC	Phil Wong	B. Schwartz, F. Chaussy	4/20/2007
NKA006267-6269	Fw: Loan Officer Branch Schedule-March 07	Phil Wong	B. Schwartz	5/30/2007
NKA006272-6276	Fw: HSBC list	Frederic Chaussy	L.Kaster,B.Schwartz, L.Lee, P. Wong	5/23/2007
NKA006277-6278	Fw: HSBC list	Phil Wong	P. Lukas	2/29/2008
NKA006279	Fw: Inventory HSBC	Phil Wong	P. Lukas	2/29/2008
NKA006280-6283	Fw: job positions	Phil Wong	L. Kaster	5/16/2007
NKA006284-6285	Fw: resignation letter	Phil Wong	P. Lukas	3/3/2008
NKA006286-6287	Re: hi phil	Bryan Schwartz	P.Wong	12/10/2007
NKA006294	No subject	Phil Wong	B.Schwartz	3/4/2008
NKA006296	RE: Phil, are you avail next Mon p.m. for preparation and Tues all day for deposition	Bryan Schwartz	P.Wong	10/25/2007
NKA006297	RE: resignation letter	Phil Wong	P.Lukas, B.Schwartz	3/1/2008
NKA006298-6299	No subject	Lucas Kaster	P.Wong	10/30/2007
NKA006301	RE: amended complaint	Phil Wong	B.Schwartz, F. Chaussy, L.Kaster	6/30/2007
NKA006302	RE: big win for us	Bryan Schwartz	P. Wong, F. Chaussy, J. Henry	3/24/2008
NKA006303	RE: cases	Phil Wong	B.Schwartz	4/15/2008
NKA006304-6307	RE: contacts from hsbc	Bryan Schwartz	P. Wong	4/23/2007
NKA006308-6309	RE: deposition preparation	Frederic Chaussy	B.Schwartz, P. Wong, J.Henry	11/16/2007
NKA006310-6316	RE: depositions	Phil Wong	L.Kaster, F.Chaussy	11/1/2007
NKA006317-6318	RE: Document (2) pdf	Phil Wong	B.Schwartz	7/17/2007
NKA006319	RE: documents you were going to give me	Phil Wong	P.Lukas	5/10/2007
NKA006320-6321	RE: Dress Code at Montgomery Branch	Phil Wong	B.Schwartz	1/23/2008
NKA006322	RE: found an employee handbook for you	Phil Wong	P.Wong, P.Lukas	7/31/2007
NKA006323-6324	fw Dress Code at Montgomery Branch	Bryan Schwartz	P.Wong	1/23/2008
NKA006325-6328	fw: and the winners are--(Retail Mortgage Masters Club)	Bryan Schwartz	F.Chaussy, L.Kaster, P.Wong	5/24/2007
NKA006329-6334	re: fw: HSBC list	Lawrence Lee		
NKA006335-6336	fw: Invitation: Action Plan Discussion(Jan 23 2:00 PM PST in Montgomery Branch 10th floor	Bryan Schwartz	P.Wong, P.Lukas	1/22/2008
NKA006337-6339	FW: Loan Officer Branch Schedule-March 07	Phil Wong	B.Schwartz	5/30/2007
NKA006340-6346	FW: Oakland Chinatown Chamber of Commerce/HSBC Bank-Community Small Business Seminar In Cantonese and Mandarin	Bryan Schwartz	P. Wong	1/17/2008
NKA006347-6349	FW: Philip Wong leave of Absence Request	Phil Wong	B.Schwartz	6/19/2007
NKA006354-6355	RE: HSBC Declaration- Wong (12-21)	Bryan Schwartz	P.Wong	12/20/2007
NKA006356-6357	RE: HSBC Investigation	Phil Wong	L.Kaster	6/14/2007
NKA006358-6360	RE: HSBC List	Frederic Chaussy	L.Lee, L.Kaster, P.Wong	5/16/2007
NKA006361	RE: HSBC NOD P.Wong	Bryan Schwartz	M. Honkanen, P.Wong	11/28/2007
NKA006362	RE: HSBC	Phil Wong	B.Schwartz	5/13/2008
NKA006363	RE: IDJ on Friday 2:51	Bryan Schwartz	P.Wong	1/7/2008
NKA006364	RE:IDJ HSBC	Phil Wong	B.Schwartz	12/28/2007
NKA006365-6370	RE: JD, response required	Phil Wong	B.Schwartz	12/28/2007
NKA006371-6373	RE: job positions	Frederic Chaussy	P.Wong, L.Kaster	5/16/2007
NKA006374-6377	RE: list	Phil Wong	L.Kaster	5/21/2007

Attorney-client Privilege e-mail log

Bates Number (s)	Subject line	Author	Recipient	Date
NKA006378-6380	RE: meeting next week	Bryan Schwartz	P. Wong, F. Chaussy	5/2/2007
NKA006381	RE: new contact info	Phil Wong	B. Schwartz	3/18/2008
NKA006384-6385	RE: Phil, are you avail next Mon p.m. for preparation and Tues all day for deposition	Bryan Schwartz	P. Wong	10/25/2007
NKA006386-6389	RE: Phil, please take a close look	Phil Wong	B. Schwartz	12/17/2007
NKA006393-6394	RE: resignation letter	Bryan Schwartz	P. Lukas	3/5/2008
NKA006395-6397	RE: retaliation	Phil Wong	B. Schwartz	1/2/2008
NKA006398	RE: today	Phil Wong	B. Schwartz	3/12/2008
NKA006399-6400	RE: tomorrow-Tuesday	Frederic Chaussy	B. Schwartz, P. Wong	4/21/2008
NKA006401	RE: Wong resignation letter	Phil Wong	B. Schwartz	3/4/2008
NKA006402-6404	RE: yesterdays meeting	Frederic Chaussy	B. Schwartz, P. Wong, J. Henry	5/4/2007
NKA006405	RE: your case was top story in employment law 360	Bryan Schwartz	P. Wong, F. Chaussy	5/10/2007
NKA006406-6407	RE: your discrimination complaint	Phil Wong	B. Schwartz	7/11/2007
NKA006406-6407	RE: your discrimination complaint	Phil Wong	B. Schwartz	7/11/2007
NKA006408	No subject	Phil Wong	L. Kaster	10/24/2007
NKA006408	No subject	Phil Wong	L. Kaster	10/24/2007
NKA006447-6451	RE: re Bofa account executive	Phil Wong	B. Schwartz	4/16/2007
NKA006447-6451	RE: re Bofa account executive	Phil Wong	B. Schwartz	4/16/2007
NKA006452-6481	re: Phil Wong, EPM	Phil Wong	P. Wong, B. Schwartz	9/17/2007
NKA006452-6481	re: Phil Wong, EPM	Phil Wong	P. Wong, B. Schwartz	9/17/2007
NKA006482-6483	RE: HSBC	Phil Wong	P. Lukas	2/29/2008
NKA006484-6486	RE: Discovery answers	Paul Lukas	P. Wong, M. Honkanen	2/23/2008
NKA006487-6488	Re: Discovery answers	Phil Wong	P. Lukas, M. Honkanen, B. Heitzinger, F. Chaussy	2/22/2008
NKA006489	RE: HSBC	Paul Lukas	M. Honkanen, P. Wong	2/13/2008
NKA006490	FW: Evidence Preservation	Bryan Schwartz	F. Chaussy, P. Wong, M. Honkanen	5/30/2007
NKA006491-96	Judicial Notice	Bryan Schwartz	P. Wong	4/28/2008
NKA006497	Case Update letter	Brad Heitzinger	P. Wong	3/26/2008
NKA006498	Discovery Answers	Paul Lukas	P. Wong, F. Chaussy, B. Heitzinger, M. Honkanen	2/22/2008
NKA006499-6503	RE: HSBC	Bryan Schwartz	P. Wong, B. Schwartz	5/15/2008
NKA006504-6510	Re: HSBC	Phil Wong	B. Schwartz	5/15/2008
NKA006511-6516	Re: HSBC	Phil Wong	B. Schwartz	5/15/2008
NKA006517-6522	Re: HSBC	Phil Wong	B. Schwartz	5/15/2008
NKA006569-6574	Re: HSBC	Phil Wong	B. Schwartz	5/14/2008
NKA006575-6580	Re: HSBC	Phil Wong	B. Schwartz	5/14/2008
NKA006581-6582	Fw: State of California	Phil Wong	B. Schwartz	5/15/2008
NKA006583-6584	Fw: Attachment of Employment 360 Article	Phil Wong	B. Schwartz	5/15/2008
NKA006585-6591	Re: HSBC	Phil Wong	B. Schwartz	5/15/2008

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
 COUNTY OF SAN FRANCISCO) ss.

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Nichols Kaster & Anderson, LLP, One Embarcadero Center, Suite 720, San Francisco, CA 94111.

On May 15, 2008, I served the within document(s):

Plaintiff Philip Wong's Privilege Log

on the person(s) at the address(es) listed below:

SEE ATTACHED SERVICE LIST

	<u>VIA U.S. MAIL:</u> By placing the document(s) listed in a sealed envelope(s) with postage thereon fully prepaid in the United States mail at San Francisco, California, addressed as set forth herein. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in the affidavit.
	<u>VIA FACSIMILE.</u> I sent such document(s) by facsimile transmission on _____. I certify that said transmission(s) was/were completed, that all pages were received, and that a confirmation report was generated by facsimile machine phone number (415) 277-7238
	<u>VIA PERSONAL DELIVERY.</u> By causing delivery of the document(s) by hand-delivery
X	<u>VIA E-MAIL.</u> I e-mailed the document(s) to all interested parties in this matter in the ordinary course of business on the date indicated herein.
	<u>VIA FEDERAL EXPRESS.</u> I am readily familiar with the practice of this office for collection and processing of correspondence for next business day delivery by FedEx, and said correspondent is deposited with FedEx on this date in the ordinary course of the business.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed this 15th day of May, 2008, at San Francisco, California.

s/Melissa A. Honkanen
 Melissa A. Honkanen

SERVICE LIST

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EXHIBIT L

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Wong, et al.,
individually and on behalf of others
similarly situated,

Case No: 07-2446 MMC

Plaintiffs,

v.

HSBC Mortgage Corporation (USA);
HSBC Bank USA, N.A; and DOES 1-50,

Defendants.

DECLARATION OF PHILIP WONG

1. I am a Plaintiff in this action against Defendants (hereinafter "HSBC"). I am over the age of 18 and competent to testify about the matters set forth in this declaration.

2. Since December 4, 2005, I have been employed as a Senior Retail Mortgage Lending Consultant ("loan officer") by HSBC at HSBC Bank's Irving Street (San Francisco), Montgomery Street (San Francisco), Oakland, and Millbrae branch offices (all in California). As a loan officer, my job duties have been consistent throughout my employment, and are entirely focused on my selling as many loans as possible. My job is to sell HSBC's mortgage and loan products and generate loans for customers according to HSBC's guidelines and procedures. I am informed and believe that the duties of other persons holding my position in my region, the San Francisco area, are and have been substantially similar to mine. These duties include, but are not limited to, the following:

- a. Calling potential customers (leads), most of which were provided to me by HSBC, in attempting to sell loans;
- b. Speaking to potential customers (leads) in HSBC branches, in attempting to sell loans;
- c. Taking information from the potential customers and completing loan applications; and

- d. Collecting client documents and answering client questions about HSBC's mortgage and loan products and/or answering questions from HSBC's underwriting department

I have not had any supervisory responsibilities.

3. I spend the majority of my time and perform the vast majority of my responsibilities working from the HSBC Mortgage Corporation office in the San Francisco area, from the HSBC branch offices assigned to me, or from my home office. My manager, Amy Ku, publishes a schedule with regular times that I am required to work from the HSBC Mortgage Corporation office and from the HSBC branch offices, which has consistently occupied more than 40 hours of my workweek and is my primary responsibility and primary source of sales leads. Ms. Ku has emphasized that branch attendance is mandatory and that, as one email stated, we are expected to be "physically at the branch as scheduled." See ATTACHMENT 1, Ku 1/02/07 Email.
4. My second-line supervisor at HSBC, Jeff Needham, told certain loan officers on a conference call that the company considers us as "outside salespersons." Yet, Mr. Needham said in the same call that the loan officers' first priority was working from the branch offices and that we were required to be in the branch offices on the days mandated by the schedules received from our managers.
5. I often work long hours in order to meet the sales demands and production quotas mandated by my managers. Prior to my brief paternity leave, I worked, on average, more than 65 hours per week. I typically worked from 6:00 or 7:00 a.m. to 7:00 or 8:00 PM Monday through Friday, from my home office and the HSBC branches. Sometimes I worked as late as 11 p.m., working with international clients. Since returning from paternity leave, I have still averaged working more than 55 hours per week. Since I am classified as exempt, I have never been paid for my overtime hours worked.
6. On Saturdays, I generally attend workshops at least twice a month lasting 3-5 hours. We also have to attend Saturday events with the branches once every three months, where we are required to work from 9:00 AM to 4:00 PM.
7. I am required to work outside the office and away from my home office at night and during the weekends several times each month to sell HSBC's mortgage and loan products in the community. These activities include, but are not limited to, attending trade shows, attending open houses to meet with realtors, and attending home buying seminars and other seminars in the community. These outside sales efforts are not my primary responsibility.
8. I have never been told by my managers about any meal and rest break policy that applies to me as a loan officer. Especially if my managers are in the office, I am discouraged from taking meal or rest breaks. When I do eat lunch during the

workday, I have to eat it at my desk while I work. I rarely take 10-minute rest breaks during the day. I have never received any premium pay for the meal and rest breaks that I have missed.

9. I was not required to have any specialized academic training to become a loan officer at HSBC. I do not possess any graduate degree and none was required of me before becoming a loan officer. I have taken some classes in economics and accounting over the years, but none of these were prerequisites to my employment at HSBC. I am informed and believe that my fellow loan officers come from a wide variety of backgrounds and do not possess and are not required to possess any specialized academic training to be able to sell loans.

10. Initially, HSBC paid me a base salary ("non-recoverable draw"), and I was supposed to receive a commission based on the volume of my mortgage sales and my number of sales. For my first 6 months at HSBC, my base salary wound up being 100% of my total compensation. For the first year, I earned a \$36,000 base salary plus approximately \$20,000 commissions. After the first 12 months, I began to receive a "recoverable draw" of \$23,000/year. HSBC currently requires us to pay back out of our commissions the administrative costs to cover any loans we originate that are declined. We eventually end up paying the application fees out of our own pockets. Since I worked an average of nearly 280 hours a month, my hourly rate has averaged less than minimum wage, and I am not consistently earning more than \$455/week.

11. HSBC did not keep any official record of my hours worked, or whether I took meal or rest breaks. HSBC never provided time sheets during my employment. I am informed and believe that none of the other loan officers I have known who have been employed by HSBC ever engaged in any formal timekeeping while employed at HSBC.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

12/12/02
Date


Philip Wong

Amy S Ku/HBUS/HSBC

01/02/2007 03:53 PM

To Philip G Wong/HBUS/HSBC@HSBC, Frederic Y
Chaussy/HBUS/HSBC@HSBC, Abby
Ho/HBUS/HSBC@HSBC
cc leah.b.gutilla@us.hsbc.com@HSBC

bcc

Subject Attendance and Punctuality.

Hi Team,

During the last team meeting on 12-18-06, I have addressed the importance of punctual branch attendance and report submission.

We are mortgage professionals and we are obligated to be punctual and committed to our own schedule. When there is a form, training or report due, we are expected to comply. In occasion that you cannot meet the above expectations, I should be notified in advance so that we can work on an alternative solution.

Effective Jan 3rd 2007, each staff is given 2 Free Passes for the year 2007 (2 "get out of trouble" tokens) that can be applied for minor tardiness in attendance, reports, etc.
The 3rd strike will result in an official write up.

As mentioned in team meeting and conference calls, when you need to change your branch schedule, you simply need to email your branch staff and cc me with an explanation. This is the minimal expectation of a professional.

In case you are overwhelmed with production and thus foresee being late in report, training, etc, you are obligated to notify me in advance.

The 2007 branch compensation model expects all bank staff to refer mortgage to us. Therefore, bank staff expects us to be physically at the branch as scheduled. Every month each LO is given the chance to submit a wish list in regards to the branch schedule and I will try my best to satisfy your wish.

I hope that no LO will be using the Free Pass in 2007 because after all, like you have heard before, if your are committed to HSBC and thrive to succeed in this business, you should treat your clients, bank staff, operation staff, Leah and me the same way as how you want to be treated.

Thank you for your cooperation!

Amy S. Ku
Retail Sales Manager, Northern California Region
HSBC Mortgage Corporation (USA)
amy.s.ku@us.hsbc.com
Fax: (917) 229-5167
Cellular: (650) 222-5645

HSBC values your patronage.

We are committed to providing overall exceptional service to our customers.

tabbies
2

Branch Schedule - January 2007

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	1. Holiday	2 Montgomery: Leah Irving: contact Amy Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	3 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Amy Warm Springs: Amy Palo Alto: contact Amy Cupertino: Fred	4 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	5 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	6
7	8 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Abby Warm Springs: Abby Palo Alto: contact Amy Cupertino: Frederic	9 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	10 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Amy Warm Springs: Amy Palo Alto: contact Amy Cupertino: Fred	11 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	12 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	13
14	15 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Abby Warm Springs: Abby Palo Alto: contact Amy Cupertino: Frederic	16 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	17 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Amy Warm Springs: Amy Palo Alto: contact Amy Cupertino: Fred	18 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	19 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	20
21	22 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Abby Warm Springs: Abby Palo Alto: contact Amy Cupertino: Frederic	23 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	24 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Amy Warm Springs: Amy Palo Alto: contact Amy Cupertino: Fred	25 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	26 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	27
28	29 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Abby Warm Springs: Abby Palo Alto: contact Amy Cupertino: Frederic	30 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	31 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Amy Warm Springs: Amy Palo Alto: contact Amy Cupertino: Fred			

Branch Schedule - February 2007

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	2 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: contact Amy	3 Fremont: Fred - by appointment
4	5 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: contact Amy Palo Alto: contact Amy Cupertino: Fred	6 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: contact Amy	7 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred	8 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	9 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: contact Amy	10 Fremont: Fred - by appointment
11	12 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Abby Palo Alto: contact Amy Cupertino: Fred	13 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	14 <i>Valentine's Day</i> Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred	15 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	16 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	17 Fremont: Fred - by appointment
18	19 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Abby Palo Alto: contact Amy Cupertino: Fred	20 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	21 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred	22 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	23 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	24 Fremont: Fred - by appointment
25	26 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Abby Palo Alto: contact Amy Cupertino: Fred	27 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	28 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred			

Branch Schedule - March 2007						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	2 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	3 Fremont: Fred - by appointment
4	5 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	6 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	7 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred	8 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	9 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	10 Fremont: Fred - by appointment
11	12 Regional Meeting Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	13 Regional Meeting Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	14 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred	15 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	16 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	17 Fremont: Fred - by appointment
18	19 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	20 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	21 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred	22 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	23 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	24 Fremont: Fred - by appointment
25	26 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	27 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	28 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Contact Amy Palo Alto: contact Amy Cupertino: Fred	29 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont: Fred Warm Springs: Fred Palo Alto: Amy Cupertino: contact Amy	30 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont: Fred Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	31 Fremont: Fred - by appointment

Loan Officer Branch Schedule - April 2007

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	2 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	3 Staff Meeting Please contact your LO	4 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	5 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: contact Abby	6 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	7
8	9 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	10 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	11 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	12 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: contact Abby	13 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	14
15	16 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	17 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	18 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	19 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: contact Abby	20 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	21
22	23 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	24 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	25 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	26 Montgomery: Leah/Abby Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: contact Abby	27 Montgomery: Leah Irving: contact Amy Oakland: Philip Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby	28
29	30 Montgomery: Leah Irving: Philip Oakland: contact Amy Fremont/Warm Springs: Fred Palo Alto: contact Amy Cupertino: Abby					